

**REQUEST FOR
SPECIAL TEMPORARY AUTHORIZATION FOR
ALTERNATIVE POST-TRANSITION DTV BUILDOUT TO
MAINTAIN EXISTING SERVICE**

Young Broadcasting of San Francisco, Inc. (“Young”), the licensee of KRON-TV and KRON-DT, San Francisco, California, hereby respectfully requests special temporary authorization (“STA”) to commence operation of KRON-DT’s DTV facility with reduced power upon the expiration of the DTV transition deadline on February 17, 2009, and thereafter for a period of six months.

Pursuant to Young’s post-transition DTV construction permits in FCC File Nos. BPCDT-20080411AAP (“Initial DTV CP”) and BMPCDT-20080619AFU (“Maximized DTV CP”), and in accordance with the Commission’s final digital table of allotments (“DTV TOA”) in *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order, FCC 08-72 (2008) (“*Seventh MO&O*”), KRON-DT will operate its post-transition DTV facility on Channel 38. Young’s current NTSC channel is Channel 4, and Young’s pre-transition DTV channel is out-of-core Channel 57. Because KRON-DT’s pre-transition DTV channel is different from its post-transition channel, absent grant of the instant STA request, KRON-DT is required to complete its full post-transition facility authorized in its Initial DTV CP by February 17, 2009.¹ Pursuant to the instant request, Young seeks an STA for KRON-DT to operate

¹ The Maximized DTV CP also bears an expiration date of February 17, 2009.

temporarily, effective February 17, 2009, at less than the full facility authorized in both its Initial DTV CP and its Maximized DTV CP.²

The instant request comports with the Commission's alternative buildout STA policy in the *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Report and Order, FCC 07-228 (2007), ¶¶ 94-96. As discussed below, (1) KRON-DT faces a significant technical impediment; (2) the proposed STA would provide service to at least 100 percent of the same population that receives Young's current analog TV and DTV service; and (3) the proposed STA would not result in any impermissible interference or prevent other stations from making their transition.

First, KRON-DT faces a significant technical impediment to the construction of its full DTV CP facility by February 17, 2009. For KRON-DT's post-transition Channel 38 operation, Young plans to employ the same transmitter KRON-DT currently uses for its pre-transition DTV operation. To modify the transmitter for full power post-transition operation by February 17, 2009, Young would have to terminate operation of KRON-DT's pre-transition DTV facility early. However, in lieu of terminating its pre-transition DTV operation early, Young desires to modify one of the transmitter's two power amplifiers for post-transition Channel 38 operation, with the other amplifier remaining on pre-transition Channel 57 until the transition date. This will permit KRON-DT to continue operation on Channel 57 until the transition and to immediately commence operation on Channel 38 on the transition date, albeit with reduced power as requested herein. Following the transition, the second amplifier will be modified for

² Young plans to construct the facility authorized by the Initial DTV CP first, and then, later in 2009, construct the facility authorized in the Maximized DTV CP.

Channel 38 operation and thereafter, KRON-DT will commence full-power post-transition operation consistent with its Maximized DTV CP. Young anticipates that conversion of the second amplifier will take less than six months, but requests a six-month STA out of an abundance of caution. Grant of the instant request, therefore, would eliminate the significant technical impediment of KRON-DT having to terminate its pre-transition DTV operation early, as would be otherwise necessary if Young must commence full-power Channel 38 operation on February 17, 2009.

To establish compliance with the second and third STA criteria, Young engaged consulting engineer Joseph M. Davis, P.E. Mr. Davis' engineering statement and figures are attached hereto to this request (the "Engineering Statement").

The second STA criterion is satisfied because the proposed STA operation is predicted to serve more than 100 percent of the same population that receives KRON's current analog TV and current DTV service. *See* Engineering Statement, at 2. Thus, the proposed operation would result in no loss of coverage to viewers.

The third STA criterion is satisfied because, as specified in the Engineering Statement, no interference study is necessary since the instant STA request specifies use of the authorized post-transition DTV CP antenna system at reduced power. *See id.*, at 1.

Because grant of the instant STA would address Young's significant technical impediment to the construction of the KRON-DT DTV CP facility, because viewers will not lose service after the transition, and because STA operation would not cause interference to any other

**Young Broadcasting of San Francisco, Inc.
KRON-DT, San Francisco, CA
STA Request**

station, the instant request comports with the Commission's alternative buildout STA policy. As such, grant of STA is warranted and will serve the public interest.

Indeed, grant of STA would serve the overriding public interest of maintaining KRON-DT's service to the San Francisco, California, community. Absent the ability to operate with reduced power on the transition date and thereafter for a limited time, it would be necessary for KRON-DT to terminate its pre-transition DTV operation early in order to facilitate the modification of its transmitter for full power Channel 38 operation which would result in loss of DTV service to the public—a result that would be contrary to the public interest. As grant of the instant STA request would help facilitate the public's continued ability to receive KRON-DT's programming, the public interest supports the grant of STA.

For the foregoing reasons, Young respectfully requests grant of STA for KRON-DT to commence operation of its post-transition Channel 38 DTV facility with reduced power upon the expiration of the DTV transition deadline on February 17, 2009, and thereafter for a period of six months. To the extent necessary, Young also respectfully requests extension of time to construct KRON-DT's full power Initial DTV CP facility and Maximized DTV CP facility during the effectiveness of the STA requested herein.

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